

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

GILBERT JAMES)
)
Plaintiff,)
)
v.) Civil Action No. 3:11cv221
)
ENCORE CAPITAL GROUP, INC., et als.)
)
Defendants.)

**PLAINTIFF'S SECOND AMENDED NOTICE OF SITE INSPECTION
PURSUANT TO RULE 34**

Plaintiff Gilbert James, by his counsel, hereby notifies the Defendants of the inspection of the following sites on March 20, 2012 at 10:00am, as provided for by Rule 34:

Description of Site	Description of Inspection
1. Any data center that houses any server or servers upon which the Defendants' intranet or other training documents are stored.	1. Videotaped documentation of the inspection of the system, and data retrieval by Plaintiff's experts of any files on the Defendants' intranet related to the training or instruction of its employees that sign affidavits or respond to ACDV disputes from the credit reporting agencies; as well as the contents of the "S:\Strategic Outsourcing" folder and all subfolders.
2. Any location that stores archived data records of any system described in #1 above.	2. Videotaped documentation of the inspection of the system, and data retrieval by Plaintiff's experts of any historical backup copies of information responsive to #1 above.

Plaintiff Gilbert James, by his counsel, further notifies the Defendants of the inspection of the following sites on March 21, 2012 at 10:00am, as provided for by Rule 34:

Description of Site	Description of Inspection
1. The employee workspaces in which the Defendants' employees that sign affidavits for use in collection cases or that respond to credit disputes from the credit reporting agencies (via the ACDV function) performed their job functions from 2009 to the present.	1. Videotaped documentation of the relevant facility or facilities, the employee workspaces and the operation of their individual workstations in conjunction with the depositions of these employees as noticed, including, but not limited to, the operation of any computerized system by which the Defendants' employees respond to ACDVs received from the credit reporting agencies or by which they access the You've Got Claims system.

Respectfully submitted,
GILBERT JAMES,

By _____ /s/
Of Counsel

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of March, 2012, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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